I support RM-10352, for the following reasons:

I have been an active amateur radio operator on 1.8 - 144 MHz (160 through 2 meters) for over 40 years. I operate both CW and SSB on the medium frequency (MF) and high frequency (HF) bands. I am an active traffic handler, DXer, contester, and ragchewer. Based on my operating experiences, I believe:

1. 160-meter weak signal CW detection, which is one of the most fascinating and technically challenging aspects of operation on that band, is responsible for some of the most impressive and significant advances in the state of the art in MF and HF communications equipment and propagation studies in recent years.

2. Weak signal CW reception on any band is incompatible with wideband modes currently in use. Logic and consistency suggest, therefore, that weak signal CW operation should be afforded no less protection on 160 meters than it is afforded by FCC regulations on all the HF and two VHF bands.

3. Advancing the state of the art [Part 97.1(b)] has long been a specific objective and *raison d'etre* of the amateur radio service. The combined effects of atmospherics, the relatively large dimensions of efficient radiating and receiving structures and ground systems, and the total lack of a skip zone to reduce the amplitude of strong signals from nearby transmitters "conspire" to make weak signal reception challenges encountered on the 160-meter band greater than those posed by any existing HF amateur band and hence an unparalleled opportunity for amateur experimentation and subsequent technical advances.

4. In contrast, and even though I use wideband modes (SSB) to ragchew on 160 meters as well as the HF bands, I have found no reason why casual wideband mode (SSB or AM) ragchewing or any possible (albeit, unlikely) resulting technical advances from such activity demands its presence across the full width of the 160-meter band. Unlike the HF bands, the users of wideband modes on 160 meters seldom occupy even 50% of the available band, much less all 100%. Clearly, ongoing access to 80% of the full allocation as proposed by the petitioners creates no hardship on any users. In other words, current and anticipated wideband mode usage of the 160-meter band provides no justification – plausible or otherwise -- for opposing RM-10352 or the creation of a CW-only subband on 160 meters.

Thank you for this opportunity to comment on the petition.

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